

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

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Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	
_____)	

**NATIONAL POSTAL MAIL HANDLERS UNION
NOTICE OF WITNESS AVAILABILITY**

Pursuant to Presiding Officer's Ruling No. 61, issued May 24, 2012, the National Postal Mail Handlers Union (NPMHU) hereby submits this Notice regarding the availability of its witnesses for oral cross-examination.

On May 29, 2012, the Postal Service submitted its Notice of Intent to Conduct Oral Cross-Examination, indicating its intent to conduct "light" (meaning less than fifteen minutes) of oral cross-examination of each of the seven NPMHU witnesses. The Postal Service noted, however, that its intention "may change depending on the responses to outstanding discovery" and stated that "[a]s circumstances permit within a week of the scheduled witness appearances, the Postal Service anticipates filing revised estimates of oral cross-examination as an aid to the Commission and the witnesses."

Six of the seven NPMHU witnesses neither work nor reside in the Washington, D.C., area, and would have to travel significant distances in order to testify for less than

fifteen minutes.¹ The NPMHU encourages the Postal Service to contact under-signed counsel to determine if designation of interrogatory responses, or written stipulations, would obviate the need for oral cross-examination. If the Postal Service withdraws its intent to cross-examine a particular witness, the NPMHU requests that the Commission permit the witness to submit a sworn affidavit adopting his testimony and any interrogatory responses designated as written cross-examination, as was done with Postal Service witness Rachel. If oral cross-examination is sought by the Postal Service or the Commission wishes to question an NPMHU witness, the NPMHU requests that the witness be permitted to testify via teleconference.

If it is necessary for witnesses to travel to Washington for in-person oral cross-examination, all NPMHU witnesses are available June 12, 13, or 14. All NPMHU witnesses except witness Broxton are available June 15.

Respectfully submitted,

Patrick T. Johnson

As agent for and authorized by

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May 30, 2012

¹ Witness Bentley works in Missouri; witness Haggarty works in Michigan; witness Hogrogian works in New York; witness Broxton works in Massachusetts; witness Wilkins works in upstate New York; and witness Hayes works in Richmond. Only witness Hora works in Washington, D.C.